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Proposed Attorney for Debtor in Possession

UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF NEVADA

In re:

Case No. BKN-17-50783 BTB  
Chapter -11-

BETRA MFG. CO.

DECLARATION OF GINO DISIMONE  
IN SUPPORT OF  
MOTION PURSUANT TO 11 USC  
SECTIONS 105(a), 363(C)  
FOR INTERIM AND FINAL ORDERS  
AUTHORIZING USE OF CASH COLLATERAL

Debtor.

Hearing Date: TBA  
Hearing Time: TBA

COUNTY OF LYON }  
STATE OF NEVADA } ss:

I, GINO DISIMONE, declare under Penalty of Perjury of the Laws of the United States  
as follows:

1. That on August 31, 2015, I was hired as General Manager of the Betra Mfg. Co.  
(Herein, Debtor)

2. That I have henceforth been named to the Board of Directors.

3. That I am responsible for the overall management of the Debtor and am fully informed  
of the exigencies of the Debtor's Chapter 11 Filing on June 27, 2016.

1 4. That on June 30, 2017, I opened a "DIP" account for the Debtor at the Carson City,  
2 Nevada, Branch of Heritage Bank.

3 5. On June 30, 2015 I also made a deposit of \$50,000 in the said account and anticipate  
4 that funds not yet placed into "DIP" from other accounts to be approx. \$75,000.

5 6. Debtor has a backlog of unfilled orders of approx \$300,000.  
6

7 7. As such I need Interim Orders to continue operations or risk loss of existing business or  
8 key employees.


9 8. As a stand alone entity I am informed and believe the Debtor could be sold for  
10 \$1,200, 000. ( If the buyer was to assume all debt.)

11 9. Otherwise the shareholder has estimated equity of \$750,000 without consideration of  
12 company cash, (now approx. \$115,000)  
13

14 10. I am informed and believe that current allowable secured claims against all company  
15 assets (6 or 7 UCC Filings) total no more than \$575,000.

16 11. I am informed and believe that Debtor has sufficient cash and existing orders to  
17 continue operations until a buyer can be found who will pay market value for the company

18 DATED this 1<sup>st</sup> Day of July, 2017

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22 GINO DISIMONE  
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